

All in violation of Title 21, United States Code, Section 846.

COUNT 2

On or about May 3, 2012, in the Western District of Tennessee, the defendant,

SAMUEL A. ROSSE, III

did unlawfully, knowingly and intentionally possess with the intent to distribute approximately 670.5 grams of Methamphetamine, classified by Title 21, United States Code, Section 812 as a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

CRIMINAL FORFEITURE

1. The allegations contained in Counts 1 and 2 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853(a)(1) and (2), the defendant,

SAMUEL A. ROSSE, III

from his engagement in any or all of the violations alleged in Counts 1 and 2 of this Indictment, punishable by imprisonment for more than one year, which counts are re-alleged and incorporated as if more fully set forth herein, shall forfeit to the United States all of his interest in: property constituting and derived from any proceeds the defendant obtained, directly or indirectly, as a result of such violations; and property used and intended to be used in any manner or part to commit and to facilitate the commission of such violations. Such property includes, but is not limited to, the following:

a. **Money Judgment:** At least Five Hundred Thousand Dollars (\$500,000.00) in U.S. Funds, representing the aggregate of the proceeds of the illegal drug trafficking conspiracy charged in Count 1, for which the defendant is jointly and severally liable;

b. **Currency as follows:**

- i. Sixteen Thousand Two Hundred Four Dollars (\$16,204.00) in United States Currency;
- ii. Five Thousand Six Hundred Sixteen Dollars (\$5,616.00) in United States Currency;

c. **Vehicles as follows:**

- i. One (1) 2008 Dodge Ram 3500, VIN 3D7MX48A38G123015, with All Appurtenances and Attachments Thereon;
- ii. One (1) 2012 Chevrolet Camaro Coupe, VIN 2G1FK1EJ7C9186196, with All Appurtenances and Attachments Thereon.

3. If any of the property described above, as a result of any act or omission of the defendant in Counts 1 and 2:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without

difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p). Such property includes, but is

not limited to, the following:

- i. One (1) Parcel of Real Property Located at 4499 County Road 160, Jonesboro, AR 72404 (Parcel 12-142244-00100), with All Appurtenances and Improvements Thereon;
- ii. One (1) Parcel of Real Property Located at 1902 W. Main St, Blytheville, AR 72315 (Parcel 305-01566-000), with All Appurtenances and Improvements Thereon;
- iii. One (1) Parcel of Real Property Located at 1910 W. Main St, Blytheville, AR 72315 (Parcel 305-01566-001), with All Appurtenances and Improvements Thereon;

A TRUE BILL:

FOREPERSON

DATED: _____

EDWARD L. STANTON III
UNITED STATES ATTORNEY